



January 17, 2025

Mr. Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628

Re: CPF-1-2024-060-NOA Response
Gulf South Pipeline Company, LLC (Gulf South)

Dear Mr. Burrough,

On December 20, 2024, the Pipeline and Hazardous Materials Safety Administration ("PHMSA") issued the above-referenced Notice of Amendment ("NOA") in association with the inspection of Gulf South Procedures for Underground Natural Storage. Record reviews were conducted from May 29, 2024, to June 13, 2024 in Petal and Jackson, Mississippi. Gulf South is a subsidiary of Boardwalk Pipelines, LP (Boardwalk).

Item 1

Gulf South's written procedures for conducting operations and maintenance activities were inadequate to ensure safe operation of a pipeline facility. Specifically, Gulf South failed to provide adequate procedures that describe the process for converting maximum and minimum pressure at the casing seat to a maximum and minimum wellhead pressure pursuant to API RP 1170, Section 9.1 (Section 9.1).

Section 9.1 states in part that "[m]aximum storage operating pressures shall be established by the operator. The operator shall then convert the maximum and minimum pressure at the casing seat to a maximum and minimum wellhead pressure if the wellhead is the monitoring point of record."

During the inspection, PHMSA reviewed Gulf South's procedure *1170-9-1 Operating Limits*, effective 05/01/2024, which Gulf South uses for establishing the maximum

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storage operating pressure and found that the procedures were inadequate. The provided procedures did not describe the specific process used by Gulf South to determine the maximum pressure of the cavern. PHMSA also reviewed the procedures for converting the maximum and minimum pressure at the casing seat to a maximum and minimum wellhead pressure. The procedures were inadequate and did not describe the process used to convert these pressures.

Therefore, Gulf South's written procedures required by §192.12(c) were inadequate. Gulf South must revise its procedures to address the deficiency outlined above.

Gulf South Response: *Gulf South revised its Underground Natural Gas Storage Manual Section 1170-9.1: Operating Limits and created procedure TL1553 Calculating Gas Cavern Operating Pressures to document the process of converting pressures.*

The following documents are enclosed:

- *MOC 2025-01-15a*
- *Underground Natural Gas Storage Manual Section 1170-9.1: Operating Limits*
- *TL1553 Calculating Gas Cavern Operating Pressures*

If you have any questions concerning the information contained in this response, please do not hesitate to contact me at tina.baker@bwpipelines.com or 270.688.6497.

Respectfully yours,



Tina Baker
Manager, Compliance Services

Attachments